

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
ATHENS DIVISION**

**UNITED STATES OF AMERICA,**

**V.**

**LANEL CHAMBERS,**  
**Defendant.**

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**No.: 3:22-CR-00025-CAR-CHW-3**

**CONSENT MOTION TO CONTINUE DEADLINE FOR PRETRIAL  
MOTIONS**

COMES NOW the Defendant above-named, by and through undersigned counsel,  
and moves this Court to enter an Order allowing an extension of time to file pretrial  
motions, in the above-captioned matter. In support thereof, Defendant shows as  
follows:

1. The Defendant's pretrial motions are due to be submitted on Wednesday, November 1, 2023.
2. Upon review of the voluminous discovery material, Counsel noted several items missing from the original and supplemental packages received from the Government.
3. Counsel alerted the Government to the missing items by email.
4. Once received undersigned will need additional time for his review of said discovery and to file any pretrial motions on Mr. Chambers' behalf.

5. Undersigned is lead counsel for the Defendant in *State of Georgia v. Quamarvious Nichols*, Case No. **22SC183572**, which commenced trial on January 4, 2023, before Chief Judge Glanville in the Fulton County Superior Court.<sup>1</sup> This is a RICO case with multiple defendants.<sup>2</sup> The trial is anticipated to last 4-6 months. *See Exhibit A attached hereto.*

6. The Defendant requests an additional (60) sixty days from November 1, 2023, in which to file his pretrial motions in the above-captioned matter and to exclude the time from the Speedy Trial Act.

7. Undersigned counsel is authorized to state that Mike Morrison, Assistant United States Attorney consents to these requests.

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<sup>1</sup> The case is State v. Khalieff Adams, No. 22SC183572, Superior Court of Fulton County, Chief Judge Ural Glanville presiding.

<sup>2</sup> There are currently 8 defendants on trial, all in custody.

WHEREFORE, based upon the within and foregoing, the Defendant requests that this Consent Motion To Continue Deadline for Pretrial Motions be granted and to exclude the time pursuant to the provisions of the Speedy Trial Act pursuant to 18 U.S.C. § 3161 (7)(A).

This 1 day of November 2023.

Respectfully submitted,

/s/ Bruce S. Harvey  
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